

TSD File Inventory Index

Date: May 17, 2010

Initial: CMH/emas

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Note: Transmittal Letter to Be Included with Reports.
Comments: _____



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

217/782-6761

RECEIVED
WMD RECORD CENTER

2200 Churchill Road, Springfield, IL 62794-9276

AUG 23 1994

December 9, 1993

Furnas Electric Company
Attn: John Kidd III
1000 McKee Street
Batavia, Illinois 60510

Re: 0890100010 -- Kane County
Furnas Electric Company
ILD005129069
Compliance File

RECEIVED

DEC 15 1993

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Dear Mr. Kidd:

The Agency is in receipt of your December 3, 1993 response to our October 2, 1991 Compliance Inquiry Letter. Based upon a review of your response, the Agency has determined that you have returned to compliance for the apparent violation of Section 722.134(a).

Through a review of the file it was discovered that the apparent violation of 722.120(a) has also returned to compliance based on your August 30, 1993 response.

Please note, although you have returned to compliance for these apparent violations, the Agency reserves the right to pursue further enforcement.

If you have any questions regarding the above matter, please contact Jan Hopper at 217/785-8604.

Sincerely,

Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Bureau of Land

BSW:JH:dv

cc: Barb Russell - USEPA

B. Russen
USEPA

217/782-6761

Refer to: 0890100010 -- Cook County
Furnas Electric Company
ILD005129069
Compliance File

COMPLIANCE INQUIRY LETTER

Certified #P 681 207 991

October 2, 1991

Furnas Electric Company
Attn: John Kidd III
1000 McKee Street
Batavia, Illinois 60510

Dear Mr. Kidd:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Subtitle G: Part 703, Subparts A through G; Part 722, Subparts A through G; Part 725, Subparts A through E and I; and Part 728, Subparts A through E and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on an inspection completed on May 17, 1991 by Darline Terrell of Dynamac Corporation (USEPA Contract #68-M9-0006) with oversight by the Illinois Environmental Protection Agency. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Lizz Schwartzkopf
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



Page 2

If you have any questions regarding the above, please contact Cliff Gould at 708/531-5900.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brian S. White".

Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Division of Land Pollution Control

BSW:JEH:LS:kkw/2912q,1-2

cc: Division File
Maywood Region
Lizz Schwartzkopf
Barb Russell, USEPA
Rick Hersemann, PRC Environmental Management Inc.
Dana Curtiss



Attachment A

1. Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

1. Without a RCRA permit for the HWM (hazardous waste management) facility; or
2. In violation of any condition imposed by a RCRA permit.

You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason(s): Your facility does not have a RCRA permit for storage of hazardous waste greater than 90 days.

2. Pursuant to 35 Ill. Adm. Code 703.150(a), the owner or operator of an existing HWM facility or of an HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

1. Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725; or
2. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725;
3. For generators which generate greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month and treat, store or dispose of these wastes on-site, by March 24, 1987.

You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason(s): Your facility has not filed a RCRA Part A permit application.

3. Pursuant to 35 Ill. Adm. Code 722.120(a), a generator must prepare a manifest before transporting or offering for transportation hazardous waste for off site treatment, storage or disposal. You are in apparent violation of 35 Ill. Adm. Code 722.120(a) for the following reason(s): Your facility did not manifest waste from Safety Kleen parts washer.

4. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

1. The waste is placed in containers and the generator complies with 35 Ill. Adm. Code 725. Subpart I or the waste is placed in tanks and the generator complies with 35 Ill. Adm. Code 725. Subpart J except 35 Ill. Adm. Code 725.297(c) and 725.300. In addition, such a generator is exempt from all the requirements in 35 Ill. Adm. Code 725. Subparts G and H, except for 35 Ill. Adm. Code 725.211 and 725.214;



2. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
3. While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste", and
4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that item(s) 4 above was/were not complied with.

Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

- a. Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies, and at a minimum meet the applicable requirements of Section 725.116(a)(3). You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reason(s): Training records do not include implementation of a contingency plan.
- b. Pursuant to 35 Ill. Adm. Code 725.116(d), the owner or operator must maintain the following documents and records at the facility:
 1. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
 2. A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
 3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;
 4. Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.



You are in apparent violation of 35 Ill. Adm. Code 725.116(d) in that item(s) 1, 2 and 3 above were not maintained at the facility.

- c. Pursuant to 35 Ill. Adm. Code 725.152(c), the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services, pursuant to Section 725.137. You are in apparent violation of 35 Ill. Adm. Code 725.152(c) for the following reason(s): The contingency plan does not describe arrangements with the local hospital.
- d. Pursuant to 35 Ill. Adm. Code 725.152(d), the contingency plan must list names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 725.155) and must be kept up to date. You are in apparent violation of 35 Ill. Adm. Code 725.152(d) for the following reason(s): The telephone number of the emergency coordinator is not listed in the contingency plan.
- e. Pursuant to 35 Ill. Adm. Code 725.152(e), the contingency plan must include an up-to-date list of all emergency equipment at the facility. The plan must include the location and a physical description of each item and a brief outline of its capabilities. You are in apparent violation of 35 Ill. Adm. Code 725.152(e) for the following reason(s): The contingency plan does not list a description of facility's emergency equipment.
- f. Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:
 - a) Maintained at the facility; and
 - b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services.

You are in apparent violation of 35 Ill. Adm. Code 725.153 in that condition(s) b above was/were not complied with.

- g. Pursuant to 35 Ill. Adm. Code 725.154, the contingency plan must be reviewed and immediately amended, if necessary, whenever:
 - a. Applicable regulations are revised;
 - b. The plan fails in an emergency;
 - c. The facility changes -- in its design, construction, operation, maintenance or other circumstances -- in a way that materially increases the potential for fires.



explosions or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency;

d. The list of emergency coordinators changes;

e. The list of emergency equipment changes.

You are in apparent violation of 35 Ill. Adm. Code 725.154 for the following reason(s): Your facility does not have an updated finalized contingency plan.

5. Pursuant to 35 Ill. Adm. Code 725.113(b), the owner or operator shall develop and follow a written waste analysis plan which describes the procedures which the owner or operator will carry out to comply with subsection (a). The owner or operator shall keep this plan at the facility. At a minimum, the plan must specify:

1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to comply with subsection (a);

2. The test methods which will be used to test for these parameters;

3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

A. One of the sampling methods described in 35 Ill. Adm. Code 721. Appendix A or

B. An equivalent sampling method.

(Board Note: See 35 Ill. Adm. Code 720.120(c) for related discussion.)

4. The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;

5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply;

6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Sections 725.293, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502, and 35 Ill. Adm. Code 728.107; and

7. For surface impoundments exempted from land disposal restrictions under 35 Ill. Adm. Code 728.104(a), the procedures and schedules for:

A) The sampling of impoundment contents;



- B) The analysis of test data; and,
- C) The annual removal of residues which are not delisted under 35 Ill. Adm. Code 720.122 and do not exhibit a characteristic of hazardous waste, and which do not meet the standards of 35 Ill. Adm. Code 728, Subpart D or, where no treatment standards have been established, the annual removal of residues which do not meet the applicable prohibition levels in 35 Ill. Adm. Code 728, Subpart C.

You are in apparent violation of 35 Ill. Adm. Code 725.113(b) for the following reason(s): There was no written waste analysis plan.

6. Pursuant to 35 Ill. Adm. Code 725.173:

- a. The owner or operator shall keep a written operating record at the facility.
- b. The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility.
 - 1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix A;
 - 2. The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities this information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest;

(Board Note: See Sections 725.219, 725.379 and 725.409 for related requirements.)

- 3. Records and results of waste analysis and trial tests performed as specified in Sections 725.113, 725.300, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502;
- 4. Summary reports and details of all incidents that require implementing the contingency plan as specified in Section 725.156(j);
- 5. Records and results of inspections as required by Sections 725.115(d) (except these data need be kept only three years);
- 6. Monitoring, testing or analytical data where required by Sections 725.190, 725.194, 725.291, 725.293, 725.295, 725.376, 725.378, 725.380(d)(1), 725.447 and 725.477; and



(Board Note: As required by Section 725.194, monitoring data at disposal facilities must be kept throughout the post-closure period.)

7. All closure cost estimates under Section 725.242 and, for disposal facilities, all post-closure cost estimates under Section 725.244.

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason(s): There was no written operating record.

7. Pursuant to 35 Ill. Adm. Code 725.212(a), the owner or operator of a hazardous waste management facility shall have a written closure plan. Until final closure is completed and certified in accordance with Section 725.215, a copy of the most current plan must be furnished to the Agency upon request including request by mail. In addition, for facilities without approved plans, it must also be provided during site inspections on the day of inspection to any officer, employee or representative of the Agency.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): There was no closure plan for the waste storage area.

8. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator shall have a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in Sections 725.211 through 725.215 and applicable closure requirements of Sections 725.297, 725.328, 725.358, 725.380, 725.410, 725.451, 725.481 and 725.504.

1. The estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan (see Section 725.212(b)); and
2. The closure cost estimate must be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of "parent corporation" in Section 725.241(d).) The owner or operator may use costs for on-site disposal if the owner or operator can demonstrate that on-site disposal capacity will exist at all times over the life of the facility.
3. The closure cost estimate must not incorporate any salvage value that may be realized by the sale of hazardous wastes, facility structures or equipment, land or other facility assets at the time of partial or final closure.
4. The owner or operator shall not incorporate a zero cost for hazardous waste which may have economic value.



You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason(s): There was no estimates for closure costs for the waste storage area.

9. Pursuant to 35 Ill. Adm. Code 728.107(a)(1), if a generator determines that the generator is managing a restricted waste under this Part and determines that the waste does not meet the applicable treatment standards set forth in Subpart D or exceeds the applicable prohibition levels set forth in Section 728.132 or 728.139, with each shipment of waste the generator shall notify the treatment or storage facility in writing of the appropriate treatment standard set forth in Subpart D and any applicable prohibition levels set forth in Section 728.132 or 728.139. The notice must include the following information:

- A) USEPA Hazardous Waste Number;
- B) The corresponding treatment standard and all applicable standards set forth in Section 728.132 or 728.139;
- C) The manifest number associated with the shipment of waste; and
- D) Waste analysis data, where available.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(1) for the following reason(s): Your facility does not provide LDR notification forms with each shipment of hazardous waste.

10. Pursuant to 35 Ill. Adm. Code 728.107(a)(6), generators shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Agency.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(6) for the following reason(s): Your facility did not retain copies of all LDR notification forms.

11. Pursuant to 35 Ill. Adm. Code 728.109(a), the initial generator of a solid waste shall determine each waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D. For purposes of Part 268, the waste will carry a waste code designation for any applicable listing under 35 Ill. Adm. Code 721, Subpart D, and also one or more waste code designations under 35 Ill. Adm. Code 721, Subpart C where the waste exhibits the relevant characteristic.

You are in apparent violation of 35 Ill. Adm. Code 728.109(a) for the following reason(s): Your facility has not conducted TCLP analysis on all waste streams.



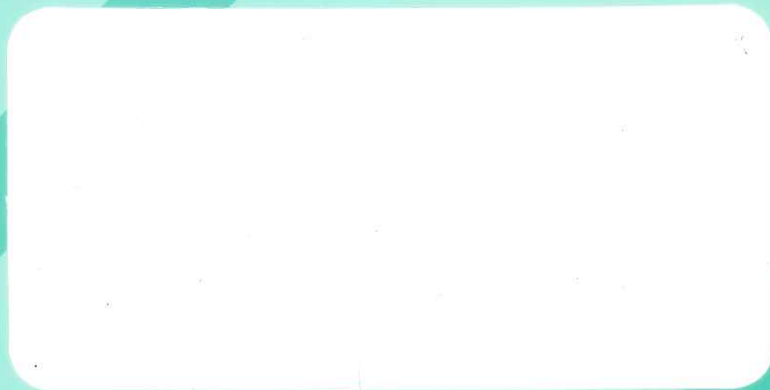
12. Pursuant to 35 Ill. Adm. Code 728.109(b), where a prohibited waste is both listed under 35 Ill. Adm. Code 721, Subpart D and exhibits a characteristic under 35 Ill. Adm. Code 721, Subpart C, the treatment standard for the waste code listed in 35 Ill. Adm. Code 721, Subpart D will operate in lieu of the standard for the waste code under 35 Ill. Adm. Code 721, Subpart C, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise, the waste must meet the treatment standards for all applicable listed and characteristic waste codes.

You are in apparent violation of 35 Ill. Adm. Code 728.109(b) for the following reason(s): Your facility has not assigned characteristics waste codes to listed wastes.

LS:kkw/2912q,3-10



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**



PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 N. Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

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PRC

RELEASED

DATE

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7/27/98
396-99
ayv

COMPLIANCE EVALUATION INSPECTION

**FURNAS ELECTRIC COMPANY
1000 MCKEE STREET
BATAVIA, IL 60510**

FINAL REPORT

Prepared for:

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	R05031
EPA Region	:	5
Site No.	:	ILD 005 129 069
Date Prepared	:	July 15, 1991
Contract No.	:	68-W9-0006
PRC No.	:	R05031-68
PRC Project Manager	:	Rick Hersemann
Telephone No.	:	(312) 856-8700
Dynamac Work Assignment Manager	:	Joseph Weslock
Telephone No.	:	(312) 466-0222
Prepared By	:	Dynamac Corporation (Darline F. Terrell)
EPA Work Assignment Manager	:	Barbara Russell
Telephone No.	:	312/353-7922

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DATE 11/27/98
RIN # 396-99
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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05031 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). This assignment involves conducting Resource Conservation and Recovery Act (RCRA) compliance evaluation inspections (CEI) in Illinois. As part of this assignment, PRC and Dynamac Corporation, PRC's TES 9 subcontractor, conducted a CEI at the Furnas Electric Company (Furnas Electric) facility in Batavia, Illinois.

The objective of the CEI was to determine the facility's compliance with applicable portions of hazardous waste management regulations of the 35 Illinois Administrative Code (35 IAC), corresponding federal regulations (40 CFR Parts 261, 262, and 265) and federal land disposal restrictions (LDR) (40 CFR 268).

PRC met with the Illinois Environmental Protection Agency (IEPA) and conducted a preinspection file review on April 1, 1991. IEPA officials provided PRC with copies of checklists to be completed during the CEI. During the file audit, the PRC team member photocopied relevant material. Following the file audit, the Dynamac team leader completed the preinspection file review form and became acquainted with the facility's operation and regulatory history. Dynamac personnel also completed a review of EPA files relating to the facility.

On May 17, 1991, PRC and Dynamac conducted an unannounced CEI at Furnas Electric Company. The following personnel were present:

John Kidd III	Furnas Electric, Plant Engineer
Bill Harmon	Furnas Electric, Safety Manager
Rick Hersemann	PRC, Inspection Team Leader
Darline Terrell	Dynamac, Inspector

PRC and Dynamac interviewed on-site personnel, reviewed records, evaluated site waste management recordkeeping, and conducted an inspection of the facility's waste management operations. Dynamac completed the applicable checklists to assist in the compliance evaluation and took photographs of significant site operations and inspection findings.

This report describes the findings of the inspection and evaluates the facility's regulatory compliance. The completed checklists are provided in Appendix A, and photographs taken during the inspection are included in Appendix B.

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2.0 FACILITY BACKGROUND

This section describes the facility's location, operations, processes that generate waste, waste streams, waste management practices, and regulatory status.

2.1 FACILITY LOCATION

The Furnas Electric facility is located at 1000 McKee Street, approximately 30 miles northwest of Chicago in Batavia, Illinois. The facility occupies one large building and two small buildings on property owned by the company. The facility is surrounded by a residential community.

2.2 FACILITY OPERATION

Furnas Electric manufactures motor controls for various industrial applications. The manufacturing process includes metal fabrication, plating, painting, plastic molding and etching.

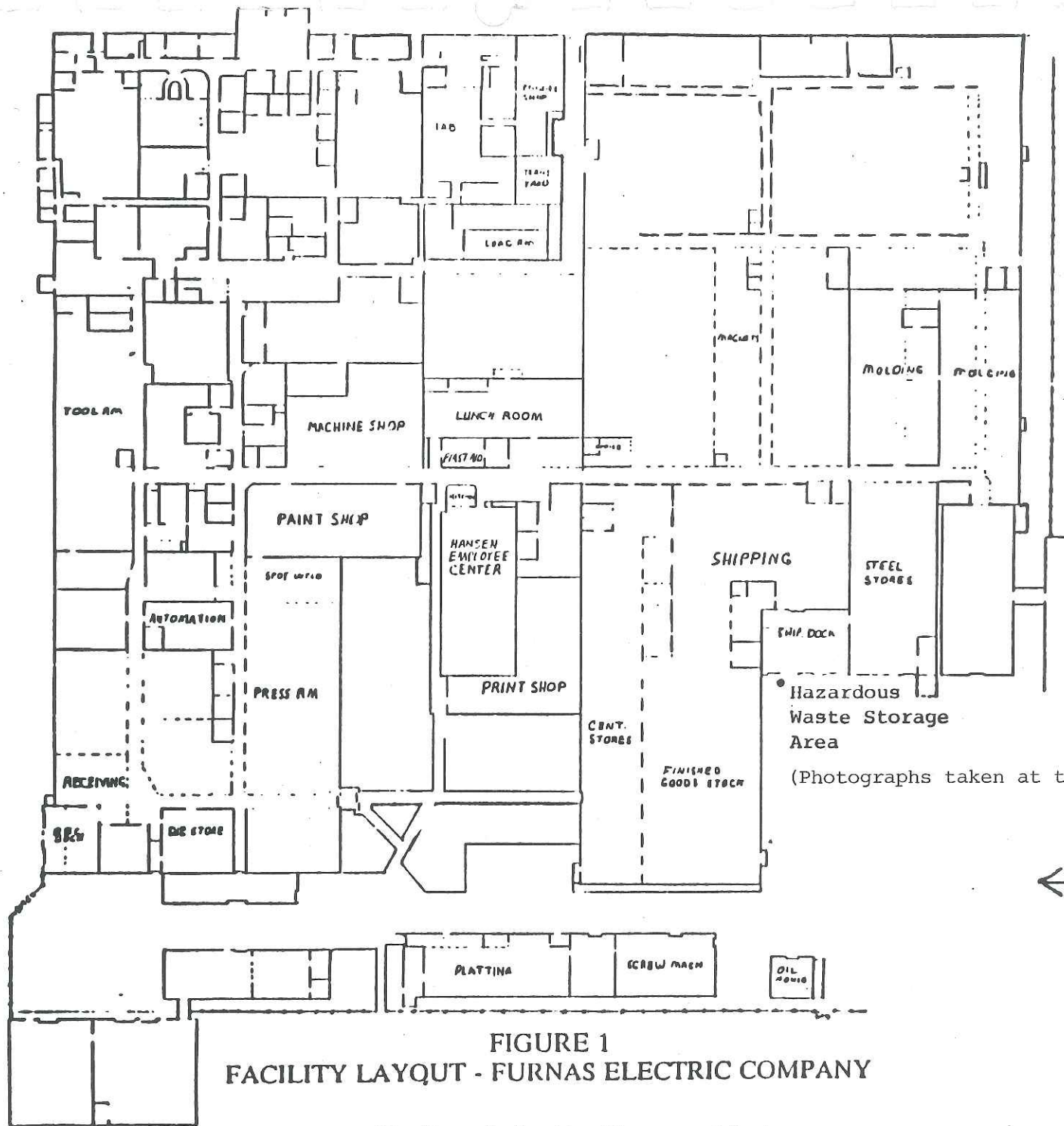
The Furnas Electric facility consists of one large building housing the offices, manufacturing operation, warehouses, shipping, and receiving docks and two small buildings housing the maintenance shop and the plating room. Figure 1 shows the Furnas Electric facility layout. Furnas Electric has operated at this location since 1938. The company employs approximately 600 people working on two shifts.

2.3 REGULATORY STATUS AND HISTORY

Furnas Electric currently operates as a RCRA generator and storage facility. On September 1, 1982, representatives from the IEPA conducted an inspection of the Furnas Electric facility. The following violations were identified during this inspection (IEPA, 1982a):

- Hazardous waste accumulation had exceeded the 90 day generator limit;
- The facility's contingency plan did not include details about the emergency equipment at the facility.

In October 1982, IEPA sent a letter to Furnas Electric listing the violations identified during the inspection, and Furnas Electric was given 15 days to notify IEPA of steps taken to correct the violations (IEPA, 1982b). In November 1982, Furnas electric submitted a detailed listing of the emergency equipment at the facility and plans for the removal of the waste which had been stored at the facility for greater than 90 days (Furnas Electric, 1982).



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Hazardous
Waste Storage
Area
(Photographs taken at this location.)



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FIGURE 1
FACILITY LAYOUT - FURNAS ELECTRIC COMPANY

(Facility Boundaries Not Shown on Map)

(Not To Scale)

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3.0 WASTE STREAMS

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Furnas Electric currently generates four hazardous waste streams. The waste streams include hazardous waste sludge from the waste water pre-treatment system in the plating line (F006), waste trichloroethylene from the vapor degreaser (F001), and caustic soda from the cleaning of the vapor degreaser (D002). The hazardous waste sludge is shipped off-site to Enviroline for treatment and disposal. The trichloroethylene wastes are recycled by Detrex, the supplier. Waste parts washer solvent (D001) is collected by the supplier, Safety-Kleen, when it is replaced with new solvent. The caustic soda wastes have never been manifested and shipped off site.

In the past, stripping operations at the facility generated a Kolene salt waste stream (D002). Furnas Electric is in the process of replacing this process with a high temperature burn-off oven. The company is having the ash from the oven analyzed to determine if the waste is hazardous. Furnas Electric has also generated a waste hazardous liquid (F002), which the plant engineer, John Kidd, was uncertain about the origins. Mr. Kidd said that the waste may have resulted from general facilities maintenance, but added this waste is not a part of the normal waste streams. Waste silver cyanide (F007) was also generated in the past at Furnas Electric from silver plating operations. The last shipments of the hazardous liquid (F002) and the silver cyanide (F007) wastes were shipped to Petro-Chem Processing and United Refinishing & Smelting, respectively, in 1989 (Furnas Electric, 1989).

The nonhazardous waste generated at the Furnas Electric facility are oil and hydraulic fluids and scrap metal. The oils and hydraulic fluids are reclaimed, and the scrap metals are sold to Cozi Metals for recycling.

4.0 INSPECTION FINDINGS

The CEI consisted of an entrance meeting, record review, facility inspection, and interviews with facility personnel. Significant findings are detailed below.

4.1 RECORDS REVIEW

PRC and Dynamac reviewed the records of hazardous waste activity at the Furnas Electric facility. The review included the manifests, annual reports and other records related to hazardous waste generation, including analytical results. The following deficiencies with Furnas Electric's personnel files and recordkeeping were identified during the records review:

- The personnel records did not include job titles and descriptions for all employees involved in hazardous waste activities;
- There was no documentation of annual training for employees who handle hazardous waste;
- The contingency plan had not been finalized. The draft contingency plan did not include a telephone number for the emergency coordinator;
- Land Restriction Disposal (LDR) Notification Forms were not attached to all of the hazardous waste manifests;
- There were no manifests for the Safety-Kleen parts washer solvents; and
- There was no data for the TCLP analysis of the waste streams generated at the facility.
- The facility did not have a RCRA Permit and had not submitted a Part A permit application.

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DATE

RIN #

INITIALS

11/27/98
396-99
WV

4.2 FACILITY INSPECTION

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PRC and Dynamac inspected production and hazardous waste management areas at the Furnas Electric facility. The largest building at the Furnas Electric facility is separated into specific departments for the many plant operations. There is a tool room in the northern portion of the building where machinery to support the various facility processes is developed and maintained. The steel stock room and the receiving dock is also located at this end of the facility. The paint shop and the machine shop are located in the center of the facility. The finished goods departments and shipping docks are located at the southern end of the building. The waste yard is a fenced in area on the outside of the southwest corner of the site. Danger signs were posted in this area. The following hazardous wastes were in the yard at the time of the inspection.

7 bags of plating sludge (F006)

accumulation dates:

5-17-91
4-18-91
4-01-91
3-13-91
2-25-91
2-07-91
2-01-91

6 drums of caustic soda (D002)

accumulation dates:

02-06-91
02-06-91
11-19-90
10-31-90
10-31-90
10-31-90

3 drums of trichloroethylene (F001)

accumulation dates:

04-08-91
04-08-91
03-08-91

1 drum of freon trichlorotrifluoroethane (F001)

accumulation date:

04-18-91

Two bags of the plating sludge waste (F006) had been stored on site-beyond the 90 day generator limit (See Appendix B, Photo 5). All of the caustic soda (D002) waste had been stored beyond the 90 day generator limit (See Appendix B, Photos 6 and 7).

There were also four unmarked drums of nonhazardous waste oil in the waste yard (See Appendix B, Photo 5).

The plating shop is housed in a building located west of the main building. Zinc, chrome, and silver plating are performed in this building. There was a vapor degreaser, a pre-treatment system, and filter press in this building. The bag next to the filter press was empty at the time of the inspection. There was a trichlorethylene product tank on the outside of the north side of the plating shop. The maintenance shop was in the building to the far northwest of the main building. The Safety-Kleen parts washer was located in this building.

5.0 INSPECTION SUMMARY AND REGULATORY DETERMINATIONS

Furnas has stored hazardous wastes beyond the 90 day generator limit, therefore the facility should be regulated as a generator and a storage facility. PRC and Dynamac identified problems with the personnel records, recordkeeping and hazardous wastes management during the inspection. The specific violations of the 35 IAC are listed below.

The facility was storing waste for greater than 90 days without complying with the following requirements:

- 722.120(a) Facility did not manifest waste from Safety-Kleen parts washer;
- 725.113(b) There was no written waste analysis plan;
- 725.116(a3)(d) Training records do not include implementation of contingency plan;
The personnel training records do not include titles and job descriptions for employees involved in hazardous waste management activities;
- 725.152(c)(d)(e) Contingency plan has not been sent to local hospital;
Telephone number of emergency coordinator not listed in contingency plan;
Contingency plan does not list description of emergency facility's emergency equipment;
- 725.154 The facility does not have an updated finalized contingency plan;
- 725.173(a) The facility did not have a written operating record;
- 725.212 The facility did not have a closure plan for the waste storage area;
- 725.242 There were no estimates for closure costs for the waste storage area;
- 703.121 The facility does not have a RCRA permit for storage of hazardous waste greater than 90 days; and
- 703.150 The facility has not filed a RCRA Part A permit application.

PRC and Dynamac identified the following LDR violations at Furnas Electric:

- 268.7(a)(1) Facility does not provide LDR notification forms which each shipment of hazardous waste;
- 268.7(a)(6) Facility did not retain copies of all LDR notification forms; and
- 268.9(a) Facility has not conducted TCLP analysis on all waste streams, nor have they assigned characteristic waste codes to listed wastes.
- 268.9(b)

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REFERENCES

IEPA, 1982a, RCRA Inspection Report, (September 1).

IEPA, 1982b, Letter listing RCRA violations identified during inspection to Furnas Electric (October 26).

Furnas Electric, 1982, Letter to IEPA. Submitted by Robert C. Fox Furnas Electric Plant Engineer (November 5).

Furnas Electric, 1989, Uniform Hazardous Waste Manifest.

Furnas Electric, 1990, Uniform Hazardous Waste Manifest.

Furnas Electric, 1991, 1990 Generator Hazardous Waste Annual Report Form. Submitted by Gilbert R. Nary, Furnas Electric Chief Operating Officer (February 22).

APPENDIX A

INSPECTION CHECKLISTS

- A-1 RCRA INSPECTION REPORT**
- A-2 PREINSPECTION FILE REVIEW FORM**
- A-3 RCRA GENERATOR AND TSD FACILITY CHECKLISTS**
- A-4 RCRA LAND DISPOSAL RESTRICTIONS CHECKLIST**

A-1 RCRA INSPECTION REPORT

ACRA INSPECTION REPORT :

TYPE OF FACILITY

Registered At:

90-Day F/U Required?:

CE: ☒ Sampling: ☐ Citizen Complaint: ☐ Closed: ☐ Other: ☐
CME/O&M: ☐ Record Review: ☐ Follow-Up to Inspection of: ☐ Withdrawn: ☐

SG. _____ Claimed Nonreader: _____ Other (Specify in Narrative): _____

Notification Date: 7/17/17 / 7/17 / 7/17, from (initial) or (subsequent) Notification.

Initial Part A Date: / /

Amended: / /

Part A Withdrawal requested: ____/____/____

Approved by (US)(IL) EPA: / /

Part B Permit Submitted: Y or N / / Final Permit Issued: / /

Has the firm been referred to - USEPA: Y or (N) ___/___/___
Illinois Attorney General: Y or (N) ___/___/___ County State's Attorney: Y or (N) ___/___/___

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___
Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

[illegible]

OWNER**OPERATOR**

Name <u>FURNAS ELECTRIC</u>	Name <u>FURNAS ELECTRIC</u>
Address <u>1000 MCKEE STREET</u>	Address <u>1000 MCKEE STREET</u>
City <u>BATAVIA</u>	City <u>BATAVIA</u>
State <u>IL</u> Zip <u>60510</u>	State <u>IL</u> Zip <u>60510</u>
Phone # <u>(708) 879-6000</u>	Phone # <u>(708) 879-6000</u>

PERSON(S) INTERVIEWED**TITLE****PHONE #**

<u>JOHN KIDD III</u>	<u>PLANT ENGINEER</u>	<u>(708) 879-6000</u>
<u>BILL HARMON</u>	<u>SAFETY MANAGER</u>	<u>(708) 879-6000</u>

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

<u>RICK HERSE MANN</u>	<u>USEPA / CONTRACTOR</u>	<u>(312) 856-8700</u>
<u>DARLINE F. TERRELL</u>	<u>USEPA / CONTRACTOR</u>	<u>(301) 417-9800</u>

PREPARED BY**AGENCY/TITLE****PHONE #**

<u>DARLINE F. TERRELL</u>	<u>USEPA / CONTRACTOR</u>	<u>(301) 417-9800</u>
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
MAN	2	722.120(a)
OTH	1	725.113(b)
OTH	2	725.116(d)(a3)
OTH	2	725.152(c)(d)(e)
OTH	2	725.154(a)(c)(d)(e)
OTH	2	725.173(a)(b)
CLO	1	725.212(a)
FIN	1	725.242
OTH	2	725.153(b)
OTH	1	703.121
OTH	1	703.150

Area	Class	Section

Area	Class	Section

Facility Name: FURNAS ELECTRIC COMPANY
 USEPA #: IL 7005129069
 IEPA #: 0890100010

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #				Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition			
			* On 8700-12	* On 3510-3	* 19 90	* 19 89							
SILVER CYANIDE	PLATING OPERATIONS	NO TCCP ANALYSIS	FO07			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	NONE	NO LONGER GENERATED	6-1-89	UNITED REFINING FRANKLIN PARK, IL
METAL HYDROXIDE SLUDGE	PRETREATMENT SYSTEM	4-23-91 METALS TCCP ONLY	FO06			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	4 15 CUBIC YARD BAGS		2-1-89	ENVIRITE HARVEY, IL.
FREON TRICHLOROFLUORO-ETHANE	USED TO CLEAN CIRCUIT BOARDS	NO TCCP ANALYSIS				<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	1 drum	1 DRUM GENERATED OVER TWO YEARS	NEVER	SHIPPED OFF-SITE
TRICHLOROETHYLENE WASTE	VAPOR DEGREASER		FO01			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	3 DRUMS	2 DRUMS/MO	3-7-91	DETREX (GOLD SIELD SOLVENT) MELROSE PARK, IL
SODIUM HYDROXIDE KOLENE SALT	WASTE FROM PAINT STRIPPING		DO02			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	NONE	NOT GENERATED ANY LONGER	2-20-91	CHEM MET MICHIGAN
METHYLENE CHLORIDE WASTE	FACILITY MAINTENANCE (FLOOR STRIPPING)		FO02			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	NONE	NOT A PART OF NORMAL WASTE STREAM	1-18-89	PETRO-CHEM. DETROIT, MI.
WASTE PAINT	FACILITY MAINTENANCE (PAINTING)		DO01			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	NONE	NOT A PART OF NORMAL WASTE STREAM	1-14-91	PETRO-CHEM.
CAUSTIC SODA	CLEANING OF DEGREASER	NO TCCP ANALYSIS	DO02			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	6 DRUMS		NEVER	SHIPPED OFF-SITE
OILS, HYDROLIC FLUIDS	FACILITY'S MACHINERY		NON-HAZ			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	4 DRUMS (OIL)			
WASTE PETROLEUM NAPHTHA	PARTS WASHER		DO01			<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	1 DRUM/MONTH		NEVER	SAFETY-KLEEN

* All "NO" responses must be explained in narrative.

A-2 PREINSPECTION FILE REVIEW FORM

PRE-INSPECTION FILE REVIEW FORM

Facility Name:

Furnas Electric Company

Location:

1500 Abbot St. Batavia, IL 60510

ID#:

ILL 505 07 069

Activity:

Generator

Last Inspection
if applicable:

9.1.82

Past Violations:

722.141 Hazardous Wastes Stored for
greater than 90 days

722.142 Emergency equipment not described
in contingency plan

A-3 RCRA GENERATOR AND TSD CHECKLISTS

FOR THE USE OF THE
 LOCAL GOVERNMENT
 BATON, FL 60510

REVISION 1 (8/15/88)

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it gener- ates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facili- ties that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements		<input checked="" type="checkbox"/>		FACILITY DID NOT USE MANIFESTS FOR WASTE PETROLEUM NAPHTHA SAFETY KLEEN MANIFESTS WERE USED FOR OTHER WASTES
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes _____ No <input checked="" type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No _____				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				

GEN-B-1

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
MAN	2				Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2				Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2				Section 722.123: Use of the Manifest For each manifest received, has the generator: <ol style="list-style-type: none"> 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				No wastes shipped by water or rail

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1	X			PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				NO WASTE READY FOR SHIPMENT
					Section 722.130: Packaging			✓	
					Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
					Section 722.131: Labeling			✓	
OTH	1	X			Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
					Section 722.132: Marking			✓	
OTH	1	X			a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				
					b Is each package of hazardous waste which is ready for transportation off-site marked with:				
					- The generator's name and address? Yes ____ No ____				
					- The manifest document number associated with the container? Yes ____ No ____				
					- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			✓	PLACARDS PROVIDED BY TRANSPORTER
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.		✓		

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>Section 722.134: Accumulation Time</p> <p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p> <p>a1 For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>a3 For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>		<input checked="" type="checkbox"/>		WASTE STORED FOR GREATER THAN 90 DAYS TSD CHECKLIST COMPLETED

GEN-C-2(a)

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>Condition of Containers (Section 725.271)</p> <p>Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Compatibility of Waste with Container (Section 725.272)</p> <p>Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Management of Containers (Section 725.273)</p> <p>Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Inspections (Section 725.274)</p> <p>Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p>				

Area	Class	30 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Special Requirements for Ignitable or Reactive Wastes (Section 725.275)</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Special Requirements for Incompatible Wastes (Section 725.277)</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>FOR WASTE IN TANKS. has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below:</p> <p>NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.</p> <p>NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.</p> <p>Assessment of Existing Tank Systems (Section 725.291)</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____</p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p> <p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes ____ No ____</p>				<p>✓ N/A</p>

GEN-C-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Design and Installation of New Tank Systems or Components (Section 725.292)</p> <p>Is secondary containment provided for any new tank system (constructed after July 14, 1986) before being put into service? Yes _____ No _____ N/A _____</p> <p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes _____ No _____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standard for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes _____ No _____ <p>Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____</p> <p>Containment and Detection of Releases (Section 725.293)</p> <p>Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A _____</p>				

GEN-C-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes _____ No _____ N/A _____</p> <p>For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No _____ N/A _____</p> <p><u>or</u></p> <p>If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes _____ No _____ N/A _____</p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p> <p>Are spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p>				

GEN-C-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p> <p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes ____ No ____ N/A ____</p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p> <p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p> <ol style="list-style-type: none"> 1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? <p>Yes ____ No ____ N/A ____</p> <p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p>				

GEN-C-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ____ No ____ N/A ____</p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ____ No ____ N/A ____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A ____</p> <p>General Operating Requirements (Section 725.294)</p> <p>Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ____ No ____</p> <p>Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ____ No ____ N/A ____</p> <p>If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ____ No ____ N/A ____</p>				

GEN-C-9

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>Inspections (Section 725.295)</p> <p>Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes ____ No ____</p> <p>Response to Leaks or Spills and Disposition of Tank Systems (Section 725.296)</p> <p>Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes ____ No ____</p> <p>NOTE: If "No", skip to Closure and Post Closure Care (Section 725.297). If "Yes", answer the following questions.</p> <p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <ol style="list-style-type: none"> 1) Ceased using, stopped inflow of wastes? Yes ____ No ____ 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____ 3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____ 				

GEN-C-10

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____</p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p> <p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? ____ Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use? Yes ____ No ____ N/A ____</p>				

GEN-C-11

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Closure and Post Closure Care (Section 725.297)</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Special Requirements for Ignitable or Reactive Wastes (Section 725.298).</p> <p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes _____ No _____</p> <p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____</p> <p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes _____ No _____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p> <p>Special Requirements for Ignitable or Reactive Wastes (Section 725.298)</p> <p>Are ignitable or reactive wastes stored in tanks? Yes _____ No _____</p> <p>NOTE: If "No", skip to Special Requirements for Incompatible Wastes (Section 725.299).</p>				

GEN-C-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes _____ No _____</p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>Are there proper protective distances between the waste management area and the facility boundary line? Yes _____ No _____</p> <p>Special Requirements for Incompatible Wastes (Section 725.299)</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes _____ No _____ N/A _____</p>				

GEN-C-13

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p>Maintenance and Operation of Facility (Section 725.131)</p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> - Air; - Soil; or - Surface Water, <p>which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-14

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes _____ No _____ N/A _____ - Complying with the requirements of: <ul style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes _____ No _____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes _____ No _____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes _____ No _____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes _____ No _____ 				<p>✓ NO SATELLITE ACCUMULATION AREAS</p>

GEN-C-26

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr Sub Sec		Yes	No		
			c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes _____ No _____</p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes _____ No _____</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes _____ No _____</p>				

GEN-C-27

Area	Class	90 Day F U Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:	✓			
			a - A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved en- forcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	✓			
				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes _____ No _____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			✓	

GEN-D-2

Area	Class	90 Day F.U. Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr.	Sub Sec		Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes _____ No _____ N/A _____</p> <p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No <u>✓</u> NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.			✓	

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			✓	
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;				
				and				
			b2	Has the importer or his agent signed the manifest in place of the generator;				
				and				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2	X		PART 722 GENERATOR STANDARDS Subpart 6: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ 				
			NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).					

GEN-G-1

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Set		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart B: Prohibitions Section 703.121: RCRA Permits				
			a	Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only: 1) With a RCRA permit for the HWM facility? Yes ____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
				2) In conformance with all conditions imposed by the RCRA permit? Yes ____ No <input checked="" type="checkbox"/> N/A ____				
			b	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ____ No <input checked="" type="checkbox"/>				
			b	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

PER-B-1

Area	Class	90 Day I.U. Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____ Is the facility only operating with a RCRA permit? Yes _____ No _____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			✓	
OTH	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes _____ No _____ N/A _____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes _____ No _____ N/A _____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.			✓	

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				Section 703.154: Prohibitions During Interim Status			✓	
					During interim status, has the facility refrained from:				
					a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ____ No ____				
					b - Employing processes not specified in Part A of the permit application? Yes ____ No ____				
					c - Exceeding the design capacities specified in Part A of the permit application? Yes ____ No ____				
OTH	1				Section 703.155: Changes During Interim Status			✓	
					<p>NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p>				
					d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ____ No ____ N/A ____				

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <u>✓</u> NOTE: If "Yes", explain in narrative.				
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No <u>✓</u>				

TSD-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	✓			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A ✓			✓	
OTH	1			b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A ✓				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ____				

TSD-B-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/>				N: WRITTEN ANALYSIS PLAN

TSD-B-2

Area	Class	90 Day Req.	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes _____ No _____</p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes _____ No _____</p> <p>2) The test methods which will be used to test for those parameters? Yes _____ No _____</p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes _____ No _____</p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes _____ No _____</p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes _____ No _____</p>				

TSD-B-3

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes _____ No _____ N/A _____</p> <p>NOTE: Circle the specific waste management methods being employed.</p>				
			c	<p>For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes _____ No _____ N/A _____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes _____ No _____ N/A _____</p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes _____ No <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>				

TSD-B-4

Area	Class	90 Day F II Rev	Key Lit	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements	<input checked="" type="checkbox"/>			FACILITY INSPECTS CONTAINER STORAGE AREA
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); <u>Weekly</u> - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>		<input checked="" type="checkbox"/>			

TSD-B-8

Area	Class	90 Day F Li Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				

TSD-B-9

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No <input checked="" type="checkbox"/>				
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No <input checked="" type="checkbox"/>				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No ____				
			e		Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	<input checked="" type="checkbox"/>			
		a		Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No ____					
		a		Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No ____					

TSD-B-10

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F II Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Set		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			<input checked="" type="checkbox"/>	

TSD-B-12

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

TSD-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
			d	<ul style="list-style-type: none"> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p> <p>Section 725.133: Testing and Maintenance of Equipment</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				

TSD-C-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems	✓			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH	1	X	b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.135: Required Aisle Space	✓			
OTH	2			Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
				Section 725.137: Arrangements with Local Authorities	✓			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

TSD-C-3

Area	Class	90 Day Full Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures</p> <p>Section 725.151: Purpose and Implementation of Contingency Plan</p> <p>a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "No", skip to 725.155.</p> <p>a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	2			<p>Section 725.152: Content of Contingency Plan</p> <p>a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:</p> <p>1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>		<input checked="" type="checkbox"/>		<p>CONTINGENCY PLAN BEING FINALIZED</p>

TSD-D-1

Area	Class	90 Day Full Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>2) Hospitals? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>3) Contractors? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				

TSD-D-2

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes ____ No <input checked="" type="checkbox"/>						
				3) The location of each piece of emergency equipment? Yes ____ No <input checked="" type="checkbox"/>						
			e	Is the list of emergency equipment up-to-date? Yes ____ No <input checked="" type="checkbox"/>						
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No ____ N/A ____						
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No ____						
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No ____						
				Section 725.153: Copies of Contingency Plan						<input checked="" type="checkbox"/>
			a	Has a copy (and all revisions) of the contingency plan:						
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No ____						
				b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ____ No <input checked="" type="checkbox"/>						

NO COPIES SENT TO
LOCAL HOSPITAL

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks - Comment No
			Sub Sec	Yes		No			
OTH	2				725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: <ul style="list-style-type: none"> a 1) Applicable regulations are revised? Yes ____ No <u>✓</u> b 2) The plan fails in an emergency? Yes ____ No ____ N/A <u>✓</u> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ____ No <u>✓</u> N/A ____ d 4) The list of emergency coordinators changes? Yes ____ No <u>✓</u> e 5) The list of emergency equipment changes? Yes ____ No <u>✓</u> 		<u>✓</u>		CONTINGENCY PLAN IS BEING UPDATED
OTH	2				Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <u>✓</u> No ____	<u>✓</u>			

TSD-D-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

TSD-D-5

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting				
				Section 725.171: Use of Manifest System				
				Does the facility accept waste from off-site? Yes _____ No <input checked="" type="checkbox"/>				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes _____ No _____				
a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes _____ No _____ N/A _____							
a3	3) Immediately give one copy of the completed manifest to the transporter? Yes _____ No _____							
a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes _____ No _____							
a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes _____ No _____							

TSD-E-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A ____</p> <p>Does the facility initiate shipments of hazardous waste? Yes ____ No ____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>				
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ____ No ____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ____ No ____</p>				

TSD-E-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance:		Not Applicable	Remarks or Comment No
			Sub- Sec		Yes	No		
OTH	2			Section 725.173: Operating Record		<input checked="" type="checkbox"/>		NO OPERATING RECORD
			a	Does the owner or operator have a written operating record at the facility? Yes _____ No <input checked="" type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes _____ No <input checked="" type="checkbox"/>				
			b	Does the operating record contain the following information:				
			1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes _____ No <input checked="" type="checkbox"/>				
			2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes _____ No <input checked="" type="checkbox"/>				
			3)	The location of each hazardous waste within the facility? Yes _____ No <input checked="" type="checkbox"/>				
			4)	The quantity of each hazardous waste at each location within the facility? Yes _____ No <input checked="" type="checkbox"/>				
			5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				

TSD-E-3

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec			Yes	No		
					<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <p>- 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No _____</p> <p>- 725.293 (Tanks)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.325 (Surface Improvements)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.352 (Waste Piles)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.373 (Land Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.441 (Incinerators)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.475 (Thermal Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.502 (Chem., Phys., Bio. Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				

TSD-E-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes ____ No <input checked="" type="checkbox"/> N/A ____				
			12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ____ No ____ N/A <input checked="" type="checkbox"/>					
				Section 725.174: Availability, Retention and Disposition of Records	<input checked="" type="checkbox"/>			
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes ____ No ____ - The local land authority? Yes ____ No ____ N/A <input checked="" type="checkbox"/> 				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

TSD-E-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	<input checked="" type="checkbox"/>			
OTH	1			Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes ____ No <input checked="" type="checkbox"/> <p>NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.</p> Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes ____ No ____ <p>Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ____ No ____</p> <p>NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:</p> Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____			<input checked="" type="checkbox"/>	

TSD-E-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____</p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>				
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

TSD-E-8

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				NO CLOSING PLAN FOR CONTAINER STORAGE AREA
			a	Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection? Yes _____ No <input checked="" type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 		<input checked="" type="checkbox"/>		

TSD-G/H-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 				
				Section 725.218: Post-Closure Plan				
			a	Was the most current facility post-closure plan available during the inspection? Yes _____ No <input checked="" type="checkbox"/>				
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				
FIN	1			Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?				<i>N. CURRENT COST ESTIMATES FOR CONTAINER STORAGE AREA</i>
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? <u>NOTE:</u> If no post-closure plan, mark "N/A".				

TSD-G/H-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
				Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	✓			
				Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	✓			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <u>✓</u> No <u> </u>	✓			
				b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No <u> </u>				
				Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <u>✓</u> No <u> </u>	✓			

TSD-I-1

Area	Class	90 Day F LI Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
OTH	1	X			<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	✓			

TSD-I-2

A-4 RCRA LAND DISPOSAL RESTRICTIONS CHECKLIST

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Furnas Electric Company
 U.S. EPA ID No.: ILD 005 129 019
 Street: 1000 Maple St.
 City: Bartonia State: IL Zip: 60511
 Telephone: (708) 879-6000

Inspection Date: 5/1/91 Time: 10:45 (am/pm)

Weather Conditions: Partly Cloudy 70's

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Rich Hersemann</u>	<u>USEPA/Contractor</u>	<u>(312) 856-8700</u>
	<u>Darlene F. Terrell</u>	<u>USEPA/Contractor</u>	<u>(301) 417-9300</u>
Facility Representatives:	<u>John Kirdel III</u>	<u>Plant Engineer</u>	<u>(708) 879-6000</u>
	<u>Bill Garman</u>	<u>Safety Manager</u>	<u>(708) 879-6000</u>

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>X</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
F020-F023 and F026-F028	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List*	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
First Third [40 CFR 268.10]	<u>X</u>	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
Second Third [40 CFR 268.11]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Third Third [40 CFR 268.12]	<u>X</u>	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

FACILITY HAS A VAPOR DEGREASER THAT GENERATES SPENT TRICHLOROETHYLENE (FOO1). FACILITY HAS A WASTEWATER TREATMENT SYSTEM IN A PLATING LINE THAT GENERATES (FOO6) SLUDGE. FACILITY ALSO GENERATES A CAUSTIC SODA (DOO2) FROM THE CLEANING OF THE VAPOR DEGREASER.

LDR Waste Management:

FOO6 SLUDGE IS STORED ON-SITE IN CUBIC YARD BAGS. SEVERAL BAGS WERE STORED GREATER THAN 90 DAYS. FOO1 AND DOO2 ARE STORED ON-SITE IN 55-GALLON DRUMS. SIX OF THE DOO2 DRUMS WERE STORED FOR GREATER THAN 90 DAYS.

Summary:

FACILITY DOES NOT PROVIDE NOTIFICATION WITH EACH SHIPMENT OF HAZARDOUS WASTE (268.7(a)(1)). FACILITY DID NOT RETAIN COPIES OF ALL NOTIFICATIONS (268.7(a)(b)). FACILITY HAS NOT CONDUCTED TCLP ON ALL WASTE STREAMS OR PROVIDED DOCUMENTATION OF KNOWLEDGE OF WASTE (268.9(a)(b)). FACILITY IS STORING FOO6 AND DOO2 WASTES FOR GREATER THAN 90 DAYS. AS A STORAGE FACILITY, FURNAS ELECTRIC DOES NOT HAVE A WASTE ANALYSIS PLAN OR OPERATING RECORD. FACILITY HAS NOT ASSIGNED CHARACTERISTIC WASTE CODES TO LISTED WASTES.

Signature:



RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
F001, F002
2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

4. First Third Wastes [40 CFR 268.10]:
F006
5. Second Third Wastes [40 CFR 268.11]:
F007
6. Third Third Wastes [40 CFR 268.12]**:
D001, D002

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes X No

If no, list below:

<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☒ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☒ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<u>F001</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>F002</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. (40 CFR 268.2(f)(1))

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. (40 CFR 268.2(f))

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
<u>F006</u>	_____	_____	<u>X</u>
<u>F007</u>	_____	_____	<u>X</u>
<u>D001/D002</u>	_____	_____	<u>X</u>

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. (40 CFR 268.2(f)(2) and (3))

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes _____ No X NA _____

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes _____ No _____ NA X

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
 _____ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes _____ No _____ NA X

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes _____ No _____ NA X

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs
 _____ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply, complete the following table for each waste code, noting the date on which the national capacity variance expires.

Waste Code	Cal List Applicability	Expiration Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐ (Go to 3.)

Comments _____

2. Which of the following methods does the generator use to make this determination (more than one may apply)?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Generator uses knowledge of process for all waste generated

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ☐ No ☒ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

FOUO sludge analyzed for TCLP metals only
on 4/23/91

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA X

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes X No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA X

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA X

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes X No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001	Petrochem, Melrose Park, IL
D002	Chem Mkt. Wyanadotte, MI
F006	Enviro, Harvey, IL
F002	Petrochem, Detroit, MI
F007	United Refining, Franklin Park, IL
D001	Petrochem, Detroit, MI

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☐ No ☒

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☒ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No X (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☐ No ☒

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☐ No ☐ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes X No (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
<u>DD02</u>	<u>Waste Water Treatment</u>	<u>System</u>
<u>FC00</u>	<u>Waste Water Treatment</u>	<u>System</u>

2. Are treatment residuals generated from these units?

Yes X No

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes X No NA

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

F006 sludge from the wastewater treatment system was stored for more than 90 days.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents Yes No X NA

F020-F023 and F026-F028 Dioxins Yes ___ No ___ NA ___

California List Wastes Yes ___ No ___ NA

First, Second, and Third Third Wastes Yes No X NA

Comments: no date analysis p/so

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes _____ No _____ NA X

3. What date was the waste analysis plan last revised? / /

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes _____ No X

If yes, which of the following are sources of analytical data? (More than one may apply.):

Generator provides data

Facility performs analyses in on-site laboratory

☐ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes No NA X

If analyses are conducted off site, identify lab: _____

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes No X NA

*See Appendix C for exceptions.

**BOAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☒

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☒

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☐ No ☒

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☐ No ☐ NA ☒

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☐ No ☐ NA ☒

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☐ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No X (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No X (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ___ No ___ NA ___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ___ No ___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ___ No ___ NA ___

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes _____

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☐ No ☐

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☐ (If No, go to 8.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☐ No ☐ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☐ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☐ No ☐ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ☐ No ☐

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ☐ No ☒ (If No, do not complete this section. Go to E.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ☐ No ☐

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ☐ No ☐

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ☐ No ☐ NA ☐

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ☐ No ☐

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, do not complete this section.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 5.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____
 Case-By-Case Extension (40 CFR 268.5) _____
 No-Migration Petition (40 CFR 268.6) _____
 Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes X No (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes No NA X

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes No NA X

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels shipped to an off-site treatment or storage facility?

Yes X No (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
<u>F001</u>	<u>Petrex</u>
<u>D002</u>	<u>Chem Hat</u>
<u>F006</u>	<u>Enviro</u>
<u>D001, F002</u>	<u>Petrochem</u>
<u>F007</u>	<u>United Refining</u>

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes No X (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☐

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☒ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

5. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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LAND DISPOSAL RESTRICTIONS INSPECTION

N/A

V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ☐ No ☐

If yes, check the appropriate regulatory status:

☐ Interim status for storage
☐ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ☐ No ☐

(If yes, the Generator checklist must also be completed.)

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☐ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units or Process</u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

Are treatment residuals generated from these units?

Yes ☐ No ☐

Comments

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ☐ No ☐ NA ☐

(If Yes, the TSD checklist must also be completed.)

APPENDIX B
PHOTOGRAPHIC LOG

Illinois Environmental Protection Agency Photographs

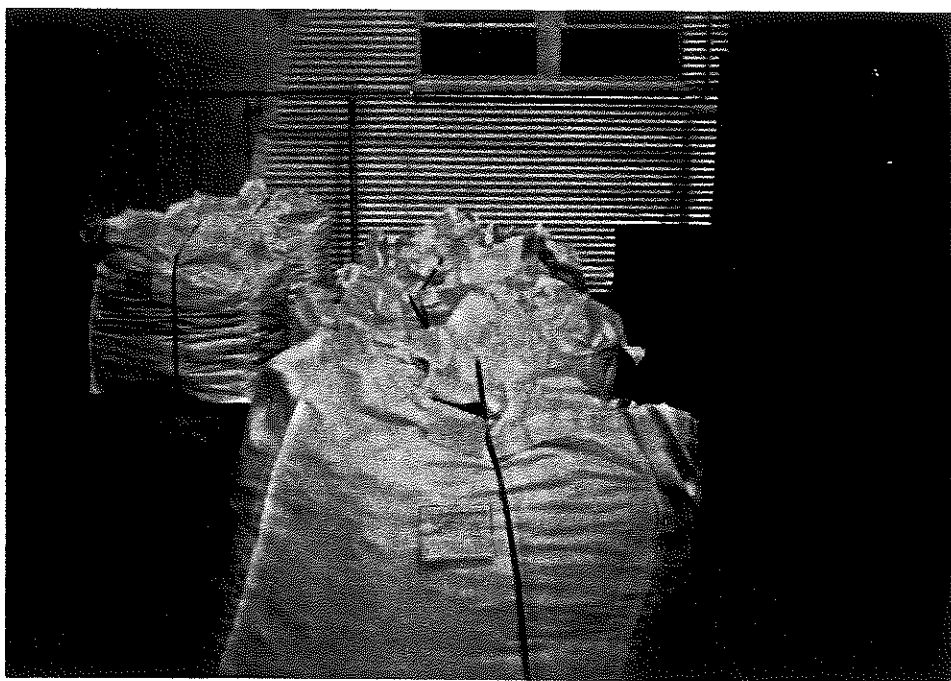
Site Name: Furnas Electric Company

Site #: 0890100010

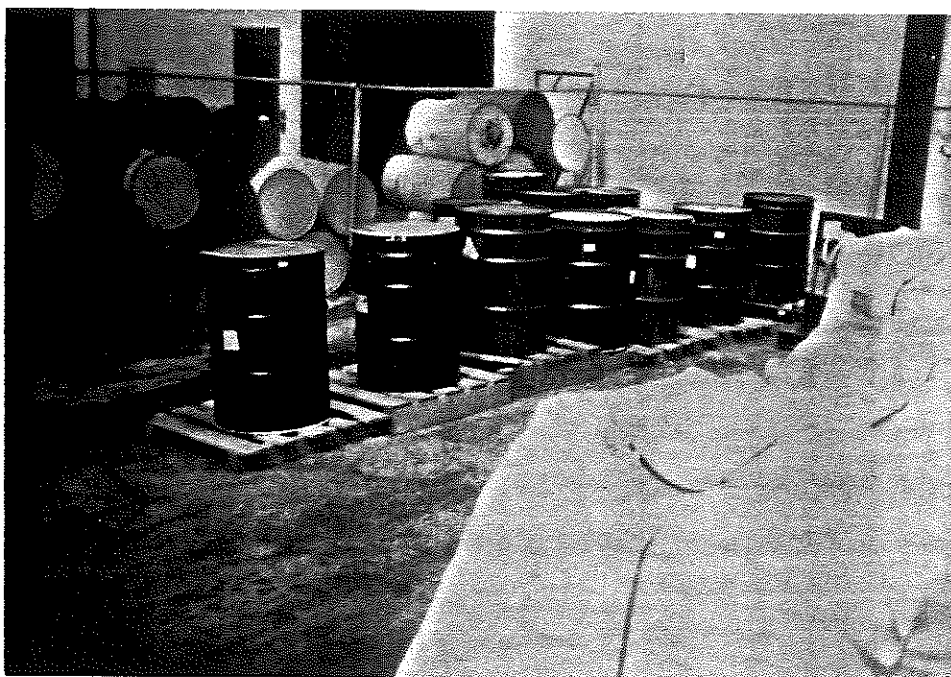
Date: 5-17-91

Time: ~ 5:00pm

Photograph by: Rick Hersemann



Comments: Hazardous Waste Storage yard; One drum of trichlorotrifluoroethane F001 far left
bags of plating sludge F006 (center); 4 drums of waste oil far right Roll #: 1 Photo #: 5



Comments: 6 drums of caustic soda stored beyond 90 day generator limit

Roll #: 1 Photo #: 6

Illinois Environmental Protection Agency Photographs

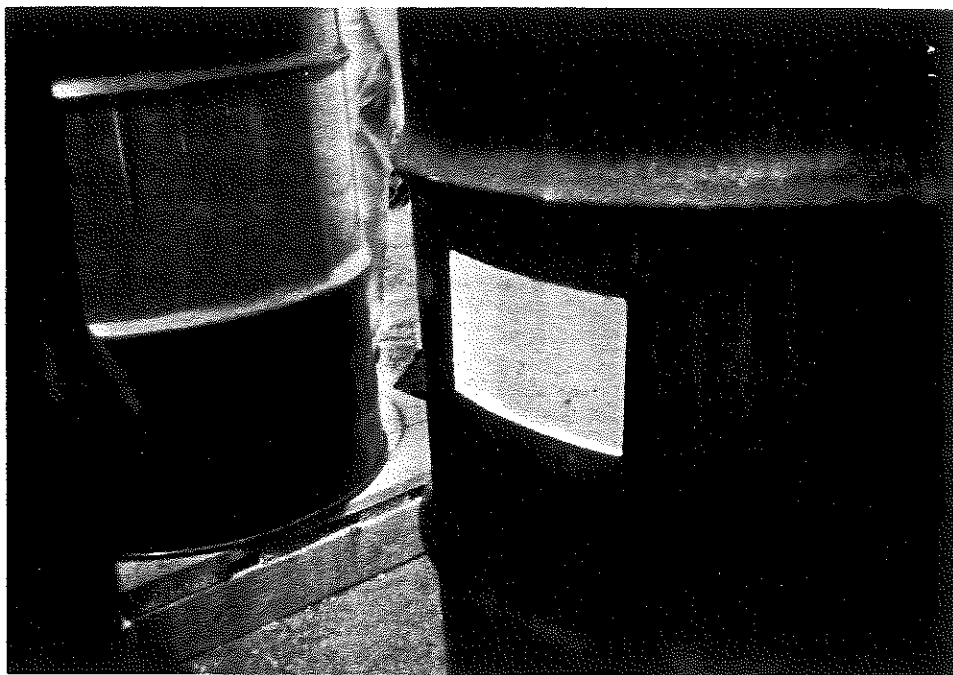
Site Name: Furnas Electric Company

Site #: 0890100016

Date: 5-17-91

Time: ~ 3:00pm

Photograph By: Rick Hersemann



Comments: Hazardous waste label on drum of caustic soda, stored beyond 90
day generator limit.

Roll #: 1

Photo #: 7

(SOURCE: _____

Roll #: _____

Photo #: _____

08901010
STATE IDENTIFICATION NUMBER
(If Applicable)

FLD 005 129 069
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

#940

I. General Information:*

- (A) Installation Name: Furnas Electric Company
(B) Street: McKee Street
(C) City: Batavia (D) State: IL (E) Zip Code: 60510
(F) Phone: (312) 879-6000 (G) County: Kane
(H) Date of Inspection: 9-1-82 Time of Inspection (From) 9¹⁵A (To) 11⁴⁵A
(I) Weather Conditions: ~ 80°, overcast

(J) Person(s) interviewed	Title	Telephone
<u>Robert Fox</u>	<u>Plant Engineer</u>	<u>312-879-6000</u>
<u>Bill Harmon</u>	<u>Safety Director</u>	<u>"</u>

(K) Inspection Participants	Agency/Title	Telephone
<u>Rick Peterson</u>	<u>IEPA / EPSI</u>	<u>312-345-9780</u>

(L) Preparer Information

Name	Agency/Title	Telephone
<u>Same</u>		

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Furnas designs and manufactures electrical switches for industrial applications. Operations include derusting, plating, and painting of some components.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Name and EPA ID Number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	N/A	not needed

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accord- ance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporter?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Former disposal site (Sheffield) cut off liquids. Furnas works with S.E.T. Liquid Wastes for future waste removal within 90 day limit.

*Not Inspected

Yes No NI* Remarks

3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?

✓

cyanide

4. If wastes are stored in tanks, are the tanks managed according to the following requirements:

a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?

N/A

b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?

c. Do continuous feed systems have a waste-feed cutoff?

d. Are required daily and weekly inspections done?

e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)

f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)

g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

*Not Inspected

31

Record the following information:

Tank capacity? N/A gallons

Tank diameter? N/A feet

Distance of tank from property line? N/A feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job Descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?

✓

b. Telephone or 2-way Radios at the scene of operations?

✓

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓

paging system

through phones

emergency showers
eye washes

Indicate the volume of water and/or foam available for fire control

50,000 gallon tank; city water

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓

in house and
outside contractor

b. Is emergency equipment maintained in operable condition?

✓

4. Has owner/operator provided immediate access to internal alarms (if needed)?

✓

pull boxes, phones

5. Is there adequate aisle space for unobstructed movement?

✓

C. Contingency Plan and Emergency Procedure
(Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

✓

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

✓

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

✓

2. Are copies of the Contingency Plan available at site and local emergency organizations?

✓

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

✓

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

✓

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

— — M/A not required

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

✓

(B) Has the generator submitted Annual Reports and Exception Reports as required?

— — M/A not required

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

— ✓ —

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing?

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country?

c. Met the Manifest requirements?

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements?

N/A

VIII. Remarks

REMARKS:

Furnas had exceeded the 90^(day) storage limit allowable for generators. At the time of the inspection, some drums had been stored on site since December of 1981. S.E.T. Liquid Waste is the site's current hauler.

Also, the contingency plan lacked a listing of emergency equipment [265.52(e)]_x and 35 Ill Adm Code 725.152(e).

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 08901010

Kane CO. - L.P.C.

Region # N

Date 09/01/82

(20)

(25)

Letter Sent (Yes or No) Y

(26)

(Location) Batavia

(Responsible Party) Furnas Electric

Samples Taken: Yes () No ()

Time: From 09:15 A m

Weather 380' overcast

Ground Water () Surface () Other ()

To 11:45 A m

Photos Taken: Yes () No ()

Interviewed Fox and Herman

Inspector R J P

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes () No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other generator ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

(30)

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I S or D

(62)

GENERAL REMARKS:

Plant Engineer Bob Fox and safety director Bill Herman were contacted. Furnas designs and manufactures electrical switches for industrial application. In producing switches, the following waste streams are generated:

① Cyanide waste (792821) - used for derusting metal before painting. Process replaced to a "reverse electrolysis" by Mr. Fox. Furnas

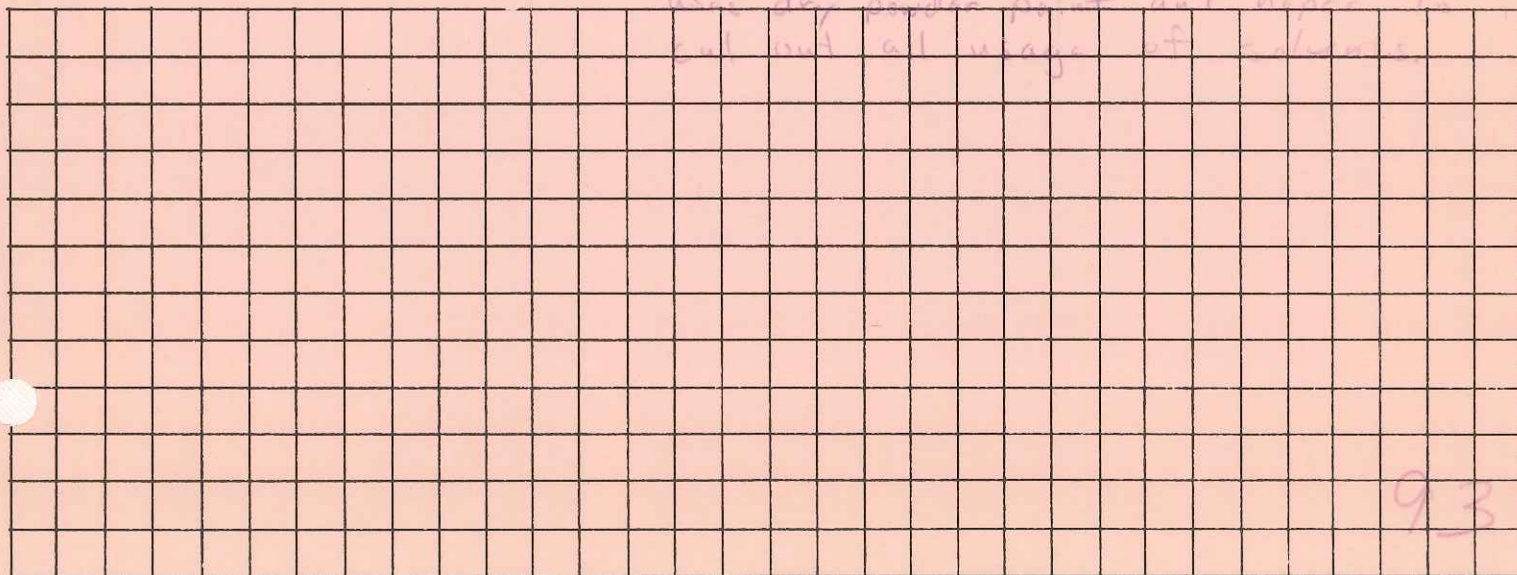
INTERVIEW:

hopes to discontinue usage of cyanide. About 4 drums were awaiting shipment for disposal.

② Tin-Sol-A (811835) - plating rinse w/ 12.9 pH. About 2 drums generated. Furnas reviewing process and hopes to eliminate usage.

③ Flammable solvent waste (802508) - used in cleaning paint shop. Very little generated. Furnas uses dry powder paint and hopes to cut out all usage of solvents.

DIAGRAM:





TO: DIVISION FILE DATE: 9-1-82
FROM: RJP ☒ Information only
SUBJECT: 08901010 - Kame Co - Batavia / Furnas ☐ Response requested
IL0 005129069 12 electric

④ neutralized chrome acid (991868) -- from
(0007) plating operation. About 1 drum/month

⑤ chromium plating waste (792820) - plating operation
pH 3.9, 0007, CN About 1 drum/month.

⑥ trichloroethylene (993850) - for cleaning parts
About 10 drums/yr

Most material had been going to Sheffield/U.S.
Ecology before the ban on landfilling these liquids.
Furnas is working w/ S.E.T. of Wheeling for
future disposal of materials. Mr Fox stated
samples have been collected by S.E.T. for
analysis.

Furnas exceed the 90 day storage limit
for generators with some drums of
waste having been on site since 12/81.

Also, the contingency plan lacked a
listing of emergency equipment as
required by 40 CFR 265.52(e) and
35 Ill Adm Code 725.152(e).



Environmental Protection Agency
170 S. First Street Maywood, IL 60153

312/345-9780

940

Refer to: 08901010 - Kane County - Batavia/Furnas Electric
ILD005129069

October 26, 1982

Furnas Electric Company
McKee Street
Batavia, Illinois 60510

Attn: Robert Fox

Gentlemen:

On September 1, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection the following apparent violations were observed:

Pursuant to 35 Ill. Adm. Code 722.134, an owner/operator may accumulate hazardous waste on-site without a permit for 90 days or less, provided that (among other requirements) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container and each container is properly labeled and marked according to 35 Ill. Adm. Code 722.131 and 722.132. At the time of the inspection, accumulation had exceeded the 90 day limit.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to Subpart D of 35 Ill. Adm. Code 725. You are in apparent violation of Subpart D of 35 Ill. Adm. Code 725 for the following reasons: The contingency plan did not list all emergency equipment at the facility, including location, a physical description, and the capabilities of the equipment.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Mr. Rick Peterson of my staff at the above number.

Sincerely,

Kenneth P. Bechely

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:RJP:prb

Enclosure: Inspection Report & Hazardous Waste Regs.

cc: Division File
Northern Region
U.S. E.P.A. - Region V